INSPECTION FILE REVIEW FORM

Name of Handler QUEEN CITY MOTOR	S Reviewer LAMDIN
EPA ID # SDR00000638	Date Reviewed 12/27/00
Inspection Date of Type CEI Inspection 7/12/0	Date of Report 8/16/00
Date of Violations Determination $9/6/00$	
Report Quality/Completeness: COMPREHENSIV	VE , CONCISE , CLEAR
Report Timeliness: 35 DAYS (≤ 45 DAY	(S)
Violation Determination Timeliness/Appropriateness	:56 DAYS FROM INSPECTION DAT (\$90 DAYS)
RCRIS Data Accuracy:	
Additional Comments: NOT APPLICABLE	
Summary of Review	
Inspection report is timely? (yes/no)	YES
Inspection report is of high quality? (yes/no) Violation determination was timely? (yes/no)	<u> </u>
Violation determination appropriate? (yes/no)	YES
Data are in DCDIS as appropriate (vec/no)	YES

ENFORCEMENT ACTION FILE REVIEW FORM

Name of Handler QUEEN CITY MOTORS R	eviewer	LAMDIN
EPA ID# 50R00000638 D	Date Reviewed	12 27 00
Enforcement Action Type (initial admin, final admin, judicial) NON-WARNING LETT Date of Inspection (Utah) or Date of Violation De	Date of Action _	9/6/00
Date of Inspection (Utah) or Date of Violation De	etermination (d	other States) 9/6/0
Enforcement Action"Timeliness: 56 DAYS (< 90 D		
Enforcement Action "Appropriateness/Completeness: YES	YES	
Penalty: NOT APPLICABLE		
Judicial Referral: NOT APPLICABLE		
RCRIS Data Accuracy: YES		
Additional Comments: NOT APPLICABLE	·	·
Summary of Review	·	
Initial action met timeliness standard? (yes/no)	·	YES
Initial action met ERP criteria for appropriateness? (yes/no	-	YES .
Penalty calculations (if appropriate) were documented? (yes	s/no)	NA NA
Final action/penalty was appropriate? (yes/no) Judicial case filing was timely? (yes/no)	-	NA NA
Data are in RCRIS as appropriate (yes/no)		YES



Received
Office of Enforcement
SEP 2 7 2000
Compliance & Env. Justice

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DEPARTMENT of ENVIRONMENT and NATURAL RESOURCES

2050 West Main, Suite #1 Rapid City, SD 57702 Telephone 605-394-2229 FAX Number 605-394-5317

September 6, 2000

Mr. Steve Allison Queen City Motors 1840 North Avenue Spearfish, SD 57783-1220

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Queen City Motors Hazardous Waste Inspection Follow Up

Dear Mr. Allison:

Thank you for your time and assistance during the compliance evaluation inspection I conducted at Queen City Motors on July 12, 2000. As I indicated during the inspection, Queen City Motors should implement the following actions to ensure compliance with South Dakota's hazardous waste regulations:

- 1. Clearly mark containers used to hot-drain used oil filters with the words "Used Oil."
- 2. Implement operational procedures to ensure service personnel properly hotdrain used oil filters, in combination with puncturing, crushing, dismantling, or an equivalent method that ensures removal of used oil from the filters before disposal as a solid waste.

Within 30 days of receiving this letter, please provide written notification Queen City Motors has implemented appropriate corrective actions so I can update our files. A copy of the inspection report has been transmitted to you under separate cover.

The information obtained at the time of the inspection indicates Queen City Motors is a Conditionally Exempt Small Quantity Generator (CESQG), typically generating a maximum of 80 pounds of hazardous waste per calendar month from the generation of mixed painting wastes, spent part-washing solvent, and spent mercury-containing lamps. Please be aware that, should your total hazardous waste generation exceed 220 lbs in any calendar month, Queen City Motors must comply with the increased regulatory requirements for Small Quantity Generators. Increased regulatory requirements for Small Quantity Generators include filing a notification of hazardous waste activity with DENR and manifesting of hazardous wastes transported off-site for disposal. There are also increased regulatory requirements for waste accumulation and

Mr. Steve Allison, Queen City Motors September 6, 2000 Page 2 of 2

storage, personnel training, contingency planning, emergency procedures, and recordkeeping and reporting for Small Quantity Generators.

If you have any questions or would like more information on South Dakota's hazardous waste regulatory requirements, please contact me at the above address or call me at (605) 394-2229.

Sincerely,

Kevin Christensen

Waste Management Program

cy: Carrie Jacobson, DENR Waste Management Program, Pierre, SD Queen City Motors Hazardous Waste File, DENR Rapid City Office



FILE COPY

DEPARTMENT of ENVIRONMENT and NATURAL RESOURCES

JOE FOSS BUILDING 523 EAST CAPITOL PIERRE, SOUTH DAKOTA 57501-3181

www.state.sd.us/denr

Waste Management Program Hazardous Waste Compliance Evaluation Inspection Report

Name:

Queen City Motors

Address:

1840 North Avenue, Spearfish, SD 57783-1220

Telephone Number:

(605) 642-2766

Identification Number:

SDR 000 000 638

Contact Person: Notification:

Steve Allison, Service Manager

Initial notification as a Conditionally Exempt Small Quantity

Generator on September 7, 1995, no subsequent hazardous waste

notification forms on file

Inspection Type:

Routine Hazardous Waste Compliance Evaluation Inspection and

EPA Hazardous Waste Oversight Inspection

Last Inspection:

No previous hazardous waste inspections at this business

Business Type:

Automotive sales and service

Employees:

About 40 total

Corporate Standing:

Registered as a corporation in good standing with the SD Secretary

of State's Office

Registered Agent:

Steven M. Christensen

68 Sherman Street, Suite 311, Deadwood, SD 57732-1364

Participants:

Steve Allison, Queen City Motors

Kevin Christensen, SD DENR Waste Management Program

Randy Lamdin, EPA Region 8

Date:

July 12, 2000

Time In:

9:00 am MDT

Time Out:

11:20 am MDT

Weather:

Sunny, light wind, 75°F

Introduction

On Wednesday, July 12, 2000, DENR personnel conducted a prearranged, hazardous waste Compliance Evaluation Inspection (CEI) at Queen City Motors in Spearfish, South Dakota. EPA personnel participated to conduct hazardous waste oversight review of the DENR Waste Management Program, in partial fulfillment of EPA and DENR agreements. DENR personnel presented credentials to business personnel upon arrival. This report summarizes the observations made during the on-site inspection.

Queen City Motors is a new car dealership (Buick, Chevrolet, and Pontiac), and automotive sales and service business located on the east side of North Avenue, near the north end of the Spearfish city limits. Mr. Allison said the company has been in business in Spearfish since the 1960s, and has been at the current location since 1972. Normal business hours are 7:30 am to 5:30 pm, Monday to Friday, and 8:00 am to noon on Saturdays. The service center currently has eight service bays opening to the north and south sides of the building, and an additional body shop bay on the east end of the building. The current building also has a new car showroom, and sales and office areas on the west end of the building. At the time of the inspection, Queen City Motors had a new building under construction on-site, just north of the current building. Mr. Allison said they will move the automotive sales and service operations into the new building upon completion of construction.

Queen City Motors generates hazardous wastes in conjunction with routine maintenance servicing, light mechanical repairs, and auto body repair and painting performed on the vehicles serviced on-site. DENR personnel began the inspection by reviewing manifest paperwork and other shipping documentation for hazardous wastes and selected solid wastes generated on-site. DENR personnel subsequently reviewed waste generation and management operations in the various automotive service shop areas. DENR personnel concluded the inspection by reviewing with Mr. Allison the inspection observations, hazardous waste generator status of Queen City Motors, relevant regulatory requirements, and waste management issues identified during the inspection. DENR personnel contacted Mr. Allison by telephone on August 8, 2000, and obtained additional information for inclusion in this report.

Wastes Generated

DENR personnel evaluated the following waste streams during the on-site inspection:

Mixed Painting Waste (D001, F003, F005): Queen City Motors generates mixed painting waste from auto body painting operations conducted on-site. Queen City Motors uses PPG-brand paint products that do not contain lead. The mixed painting waste consists of lacquer thinner used to clean painting equipment, and a small amount of paint and reducer removed from painting equipment during the cleaning process. Based upon MSDS information the lacquer thinner contains toluene, xylene, and acetone, and has a flash point of 10 °F. Therefore, the mixed painting waste exhibits the ignitability characteristic and, due to the presence of toluene, xylene, and acetone in the cleaning solvent, is an F003 and F005 listed hazardous waste. Therefore, this waste generation was included in determination of the hazardous waste generator status for Queen City Motors.

As they generate the mixed painting waste, shop personnel accumulate it in a 55-gallon polyethylene drum in the auto body shop area. At the time of the inspection, less than five gallons (37.5 pounds) of mixed painting wastes were stored on-site. The accumulation container for this waste was marked as "flammable," but was not marked with the words "Hazardous Waste." DENR personnel discussed hazardous waste accumulation requirements

for Conditionally Exempt Small Quantity Generators with Mr. Allison. Conditionally Exempt Small Quantity Generators are not required to mark hazardous waste accumulation containers with the words "Hazardous Waste" or an accumulation start date. The most recent shipment of mixed painting wastes occurred on May 2, 2000, 71 days before the on-site inspection. Review of the manifest information showed Queen City Motors generated 35 gallons of mixed painting wastes over the six-month period since the last previous shipment on October 20, 1999. This equates to an average mixed painting waste generation of 44 pounds per calendar month (35 gal x 7.5 lbs/gal ÷ 6 months = 43.8 lbs/mo). The review of manifests for the last four years also indicates Queen City Motors would generate a maximum of about 70 gallons of mixed painting wastes per year. The manifest information showed Waste Recovery Services (NDD982591792) transports the mixed painting wastes to their Belfield, North Dakota, facility as a hazardous waste.

Spent Parts-Washing Solvent (D001, D018, D039, D040): Queen City Motors generates spent parts-washing solvent from the use of petroleum-naphtha-based solvent in a parts-washing unit used to clean parts during maintenance and repair operations. Queen City Motors has one Safety-Kleen Model 14 parts-washing unit on-site. This parts-washing unit is a portable 5gallon unit using Safety-Kleen 105°F flash point solvent. Based on process knowledge, the spent solvent may exhibit the hazardous waste characteristics indicated above. Therefore, this waste generation was included in determination of the hazardous waste generator status for Queen City Motors. Safety-Kleen Systems, Inc. (Safety-Kleen) services the 5-gallon unit on a 16-week basis. During the inspection, Mr. Allison said Safety-Kleen used to leave an additional five-gallon container of parts-washing solvent on-site during routine services. Shop personnel would then change out the solvent after about eight weeks, and Safety-Kleen would pick up this used solvent during the next service. However, there was no additional product or spent solvent stored on-site at the time of the inspection, or documented on manifest information from the previous service event. In a subsequent telephone conversation, Mr. Allison confirmed Queen City Motors no longer changes out this solvent between scheduled services.

During the inspection, Queen City Motors provided copies of shipping documents requested by DENR personnel for the spent parts-washing solvent (see attachments). Review of the shipping documents indicates Queen City Motors generates a maximum of 34 pounds (5 gal x 6.7 lbs/gal = 33.4 lbs) of spent parts-washing solvent in those months that Safety-Kleen services the parts-washing unit, or that shop personnel remove solvent from the unit. The shipping information reviewed showed Safety-Kleen Systems, Inc. (ILD984908202) transports the spent parts-washing to solvents to their Gering, Nebraska, facility (NED000687178) as a hazardous waste.

<u>Spent Mercury-Containing Lamps (D008, D009)</u>: Queen City Motors generates spent mercury-containing lamps from routine maintenance of fluorescent lighting in the office and shop areas. Based on process knowledge, fluorescent light bulbs may exhibit the hazardous waste characteristics for lead and mercury toxicity. Therefore, this waste generation was included in determination of the hazardous waste generator status for Queen City Motors. Mr. Allison said Queen City Motors only generates small quantities of used fluorescent light bulbs

because the bulbs do not require frequent changing. Based on the inspection observations, Queen City Motors does not generate a sufficient quantity of spent mercury-containing lamps to affect determination of their hazardous waste generator status. Mr. Allison said Queen City Motors currently disposes of their used fluorescent light bulbs at the Belle Fourche landfill. Under ARSD and 40 CFR requirements, Conditionally Exempt Small Quantity Generators may dispose of hazardous wastes that do not contain free liquids at permitted municipal solid waste facilities. DENR personnel discussed regulatory requirements and waste management options for used fluorescent light bulbs with Mr. Allison during the inspection.

<u>Spent Lead-Acid Batteries (D001, D002, reclaimed):</u> Queen City Motors generates spent lead-acid batteries from the replacement of spent batteries in vehicles. Queen City Motors recycles the spent batteries through the Battery Shack in Rapid City. ARSD and 40 CFR requirements do not count spent lead-acid batteries that are properly recycled toward determination of generator status. Mr. Allison estimated Queen City Motors generates seven to ten spent lead-acid batteries per month. No spent batteries were stored on-site at the time of the inspection. DENR and Queen City Motors personnel discussed storage of spent lead-acid batteries to prevent freezing and cracking that can result in the leakage of acid from the batteries.

Spent Refrigerants (not hazardous waste, reclaimed): Queen City Motors generates spent CFC-12 (dichlorodifluoromethane) refrigerant from repair and servicing of automotive air conditioning systems. ARSD and 40 CFR requirements do not regulate used chlorofluorocarbon refrigerants from mobile air conditioning systems as hazardous waste, provided the refrigerant is reclaimed for further use. Queen City Motors uses a commercial reclamation unit to reclaim the spent CFC-12 refrigerant on-site and reuses the refrigerant in vehicles serviced on-site.

Used Oil (not hazardous waste, recycled): Queen City Motors generates used oil from routine maintenance servicing of vehicles. ARSD and 40 CFR requirements do not regulate used oil as hazardous waste, provided the used oil is properly recycled. Queen City Motors recycles the used oil through RCR Company in Rapid City. Queen City Motors collects the used oil in a 300-gallon capacity tank located outside on the south side end of the building. The tank was clearly marked as used oil. During the review of on-site records, DENR personnel verified Queen City Motors had records documenting RCR Company (SDD987670148) picks up the used oil. The records reviewed (see attachments) indicates Queen City Motors generates 350 to 780 gallons of used oil monthly. The records show RCR Company picks up the used oil two to three times per month, as needed.

The review of records also showed that Queen City Motors' personnel had not signed some of the used oil shipping documents on file. Other required information was present on the forms. DENR personnel discussed used oil recordkeeping requirements with Mr. Allison and indicated they need to ensure Queen City Motors' personnel sign these documents. Mr. Allison stated they would make sure they properly complete the required information.

Mr. Allison also said he was currently evaluating used oil storage for the new building currently under construction, and asked about secondary containment requirements for aboveground used oil storage tanks. DENR personnel discussed the relevant used oil storage tank

requirements and potential spill issues with Mr. Allison. DENR personnel said that, although secondary containment is not currently required, it is a good practice.

<u>Used Oil Filters (not hazardous waste):</u> Queen City Motors generates used oil filters from routine maintenance servicing of vehicles. ARSD and 40 CFR requirements do not regulate non-terne plated used oil filters that are properly gravity hot-drained as hazardous waste. Mr. Allison said shop personnel hot-drain the used oil filters for about 48 hours into two, 55-gallon drums used to collect the used oil that drains from the filters.

Used oil filters observed at the time of the inspection had not been punctured, crushed, or disassembled to ensure complete drainage. In addition, the two 55-gallon drums were not clearly marked as "Used Oil." DENR personnel discussed applicable hazardous waste requirements for used oil filters with Mr. Allison. Mr. Allison said Queen City Motors would implement procedures to ensure the used oil filters generated on-site managed in accordance with ARSD and 40 CFR requirements.

<u>Spent Antifreeze (not hazardous waste, recycled):</u> Queen City Motors generates spent antifreeze from routine maintenance servicing of vehicles. Queen City Motors reclaims the spent antifreeze on-site in a commercial filtration unit. Based on process knowledge, used antifreeze does not typically exhibit a hazardous waste characteristic. Therefore, DENR personnel did not require testing of this waste stream and did not include this waste in the determination of Queen City Motors' generator status. Mr. Allison estimated Queen City Motors typically generates and reclaims less than 10 gallons of spent antifreeze monthly. At the time of the inspection, about 25 gallons of spent antifreeze was stored on-site in a 55-gallon drum marked as "Used Coolant." Queen City Motors reuses the reclaimed antifreeze in the vehicles serviced on-site.

During the inspection, Mr. Allison also asked DENR and EPA personnel about recycling of "extended life" antifreeze products used in some newer vehicles. Mr. Allison said the extended life antifreeze is ethylene glycol based, but additives enable it to be used for about 100,000 miles before replacement. Mr. Allison did not think the extended life antifreeze could be recycled in their current antifreeze reclamation unit. DENR and EPA personnel suggested Mr. Allison check with the antifreeze supplier (General Motors) to find out if this product is amenable to recycling, and check with the manufacturer of their current antifreeze recycling unit if it can effectively recycle spent extended life antifreeze.

Parts-Washer Wastewater (not hazardous waste): Queen City Motors has a Better Engineering Model 200-HD parts-washing unit used to clean parts during routine maintenance servicing of vehicles and equipment. The parts-washing unit is an automatic unit and uses a hot water and detergent solution. Mr. Allison said shop personnel remove about 50 gallons (50 gallons x 8.34 lbs/gal = 417 lbs) of wastewater from this unit weekly. Queen City Motors discharges this wastewater to the Spearfish wastewater treatment system through the floor drain located in the shop area (see sump wastes below). ARSD and 40 CFR requirements do not regulate point source industrial wastewater discharges to a Publicly-Owned Treatment Works as solid or hazardous wastes. Additionally, previous DENR review of test results indicates wastewater from these types of units at automotive shops do not typically exhibit

hazardous waste characteristics for metals toxicity. Therefore, this waste generation was not included in the determination of generator status for Queen City Motors, and DENR personnel did not request additional testing of this waste stream. Mr. Allison said frequent changes of the unit prevent the buildup of sludge in the bottom of the parts-washing unit. The parts-washing unit is equipped with an oil-skimming unit. Service personnel periodically add the used oil collected from the skimmer to the other used oil managed on-site.

<u>Used Tires (not generated):</u> Mr. Allison said Queen City Motors does not sell tires or perform tire services. Therefore, Queen City Motors does not generate any used tires on-site. Mr. Allison said they refer any tire sales or service work to local tire dealers. DENR personnel did not observe any used tires stored on-site during the inspection.

Sump Wastes (not hazardous waste): Queen City Motors generates sump wastes from routine maintenance of the floor sump. The floor sump consists of an oil-water separator that gravity-drains to the Spearfish wastewater treatment system. Based on process knowledge, automotive shop sump wastes do not typically exhibit a hazardous waste characteristic. Therefore, DENR personnel did not require testing of this waste stream and did not include this waste in the determination of Queen City Motors' generator status. Based on the records reviewed (see attachments), Superior Sanitation, Spearfish, removes wastes from the floor sump about once per month. Superior Sanitation takes the sump wastes to a permitted facility in Belle Fourche for disposal as solid waste. During the review of on-site records, DENR personnel verified Queen City Motors had records documenting Superior Sanitation removes wastes from the sump periodically. DENR personnel contacted Superior Sanitation to verify how they manage the sump wastes. Tom Nelson confirmed that Superior Sanitation pumps the sumps at Queen City Motors monthly and manages the sump wastes at the permitted facility in Belle Fourche, SD.

Miscellaneous Solid Wastes (not hazardous waste): Queen City Motors' service personnel occasionally use aerosol solvent, oil, or paint products. Mr. Allison said service personnel use the containers until empty. Queen City Motors manages the empty aerosol containers as solid waste. Service personnel also change out 12 air filters (estimated less than ten pounds total) used in the auto body shop painting area every three to four months. The filters are dry at the time of generation and managed as solid waste. Service personnel also use paper rags in the shop area and manage the used rags as solid waste. DENR personnel did not observe partially full aerosol containers or wet rags in garbage receptacles during the inspection. DENR personnel also discussed hazardous waste requirements applicable to disposal of used aerosol containers with Mr. Allison.

Queen City Motors also generates miscellaneous solid wastes (paper, plastic, aluminum, food wastes, etc.) from the various shop and office areas. Queen City Motors' personnel place the miscellaneous solid wastes requiring disposal into an on-site dumpster. Waste Connections of South Dakota, Belle Fourche, collects the solid wastes in the dumpster regularly for disposal at the Belle Fourche landfill. Mr. Allison also said Queen City Motors does not recycle any of the solid wastes generated on-site through area recycling companies.

Hazardous Waste Generator Status

Based on the information obtained from the inspection, Queen City Motors is a Conditionally Exempt Small Quantity Generator (CESQG) generating less than 220 lbs/month of hazardous wastes per calendar month. Queen City Motors generates a maximum of about 80 pounds of hazardous wastes monthly from the generation of mixed painting wastes, spent parts-washing solvents, and spent mercury-containing lamps. Queen City Motors also generates additional wastes not counted toward determination of hazardous waste generator status under ARSD and 40 CFR requirements.

Hazardous Waste Minimization

Queen City Motors practices waste minimization through the recycling and reclamation of applicable waste streams. Queen City Motors has realized waste reductions through the following waste minimization methods:

<u>On-Site Reclamation and Recycling</u>: Queen City Motors reclaims used antifreeze and spent refrigerants generated on-site for reuse in the vehicles serviced on-site.

<u>Product Substitutions and Toxicity Reduction</u>: DENR personnel did not identify any product substitution or toxicity reduction activities during the inspection.

<u>Waste Elimination</u>: DENR personnel did not identify any waste elimination activities during the inspection.

<u>Off-Site Reclamation and Recycling</u>: Queen City Motors recycles mixed painting wastes and spent parts-washing solvents through Safety-Kleen. Queen City Motors also recycles the used motor oil generated on-site through RCR Company and reclaims spent lead-acid batteries through the Battery Shack.

Compliance Evaluation

<u>Determination of Hazardous Wastes</u>: Queen City Motors has generally determined if wastes generated on-site are a hazardous waste through a combination of testing and process knowledge. DENR personnel did not identify any wastes requiring additional information to determine their regulatory status during the inspection.

Identification Number: As a CESQG, Queen City Motors is not required to file a Notification Of Hazardous Waste Activity form for the hazardous waste management activities conducted onsite. However, Queen City Motors has obtained a hazardous waste identification number and uses transporters and waste management facilities with hazardous waste identification numbers for the management of wastes transported off-site to permitted hazardous waste facilities.

Manifests and Land Disposal Restriction Notifications: As a CESQG, Queen City Motors is not required to use, or to maintain copies of, Uniform Hazardous Waste Manifests and Land Disposal Restriction Notification forms. However, Waste Recovery Services completes hazardous waste manifests for the mixed painting wastes transported off-site, and Safety-Kleen completes shipping documents containing hazardous waste information for the spent parts-washing solvent transported off-site.

DENR personnel reviewed Uniform Hazardous Waste Manifests and other shipping documentation for the regulated hazardous wastes transported off-site for recycling or disposal. DENR personnel also reviewed shipping documentation for used oil and sump wastes generated at Queen City Motors. During the inspection, DENR personnel obtained copies of selected records from Queen City Motors for additional review and inclusion in this report. DENR personnel also contacted Waste Recovery Services on August 8, 2000, and obtained additional hazardous waste manifest copies for inclusion in this report. Waste Recovery Services provided copies of the requested manifests on August 14, 2000.

The hazardous waste manifests reviewed were properly completed, and signed and dated by the generator, each transporter, and the waste management facility receiving the waste shipment. The other hazardous waste shipping documentation reviewed was also properly completed. Queen City Motors retains copies of manifests and other required documentation for a minimum of three years. DENR personnel did not note any significant manifest discrepancies or other issues from the records reviewed.

Waste Accumulation: The hazardous wastes identified are typically generated in small quantities (five gallons or less) during automotive painting operations or servicing of the parts-washing unit by Safety-Kleen. Queen City Motors stores small quantities of these wastes on-site until they accumulate a sufficient quantity for recycling or disposal. Based on the information obtained from the inspection, Queen City Motors does not accumulate regulated hazardous wastes on-site in quantities exceeding the regulatory limits for CESQGs. Non-hazardous wastes are either recycled on-site, stored on-site until transported off-site for recycling, disposed through discharge to the Spearfish wastewater treatment system, or disposed as solid waste at the Belle Fourche landfill.

<u>Personnel Training:</u> As a CESQG, Queen City Motors is not required to maintain written records of employee training. Mr. Allison said Queen City Motors covers waste handling and emergency procedures in training provided to employees to ensure employees are familiar with waste handling and emergency procedures. DENR personnel suggested Queen City Motors document personnel training activities during safety meetings by the use of file memorandums.

<u>Preparedness and Prevention</u>: As a CESQG, Queen City Motors is not subject to specific preparedness and prevention requirements under ARSD and 40 CFR hazardous waste requirements. However, inspection observations indicated Queen City Motors maintains and operates the hazardous waste storage areas to minimize the possibility of fire, explosion, or unplanned releases. Queen City Motors also has external communications systems, fire

extinguishers, spill control materials, and water at adequate pressure and volume to supply fire control equipment.

<u>Contingency Plan</u>: As a CESQG, Queen City Motors is not required to maintain a written contingency plan on-site under ARSD and 40 CFR hazardous waste requirements.

<u>Recordkeeping and Reporting</u>: As a CESQG, Queen City Motors is not subject to specific recordkeeping and reporting requirements under ARSD and 40 CFR hazardous waste requirements. However, Queen City Motors maintains copies of signed hazardous waste manifests and other waste management records for at least three years. DENR personnel obtained copies of selected records from Queen City Motors for review and inclusion in this report (see attachments).

<u>Used Oil Requirements</u>: The used oil generated on-site is transported off-site for recycling by a used oil transporter with a valid identification number.

At the time of the inspection, DENR personnel noted Queen City Motors did not have the used oil storage containers used to hot-drain used oil filters clearly marked as "Used Oil." DENR personnel also noted service personnel did not puncture, crush, or disassemble used oil filters in combination with hot-draining before disposal of the filters as a solid waste. The review of records also showed that Queen City Motors' personnel had not signed some of the used oil shipping documents on file. Mr. Allison stated Queen City Motors would appropriately label used oil storage containers and implement operational procedures to ensure they manage used oil and used oil filters in accordance with ARSD and 40 CFR requirements.

Summary

DENR personnel conducted this inspection as a routine hazardous waste Compliance Evaluation Inspection. EPA personnel attended to conduct hazardous waste oversight review of the DENR Waste Management Program, in partial fulfillment of EPA and DENR agreements.

Based on the information obtained from the inspection, Queen City Motors is a Conditionally Exempt Small Quantity Generator generating less than 220 pounds of hazardous wastes per calendar month. Queen City Motors generates a maximum of about 80 pounds of hazardous wastes monthly from the generation of mixed painting wastes, spent parts-washing solvents, and spent mercury-containing lamps. Queen City Motors also generates additional wastes not counted toward determination of hazardous waste generator status under ARSD and 40 CFR requirements.

Queen City Motors has accomplished hazardous waste minimization through the recycling of applicable waste streams.

During the inspection, DENR personnel noted Queen City Motors did not have containers used to hot-drain used oil filters clearly marked as used oil. Also, Queen City Motors' service personnel did not puncture, crush, or disassemble used oil filters before disposal as a solid waste. The review of records showed Queen City Motors' personnel had not signed some of the used oil shipping documents on file. DENR personnel are continuing to work with Queen City Motors to resolve the waste management issues identified during the inspection.

Signature

Kevin Christensen

Waste Management Program

Date

Attachments

Waste Recovery Services Hazardous Waste Manifests	A-2 to 6
Safety-Kleen Hazardous Waste Shipping Documentation	A-7 to 9
RCR Company Used Oil Shipping Documentation	A-10, 11
Superior Sanitation Sump Wastes Documentation	Δ-12

	WASTE MANIFEST	1. Generator's US EPA ID No	Docur	est ment No.	2. Page 1 of 1	is not required	the shaded areas d by Federal law.
		UEEN CITY MOTORS 840 NORTH AVENUE			A. State Ma	nifest Documen	t Number
	I .	PEARFISH, SD 577	783-0277		B. State Ge	nerator's ID	
	5. Transporter 1 Company Name		JS EPA ID Number	r	C. State Tra	insporter's ID	/U_331
			8.2.5.9.1		DTranspor	ter's Phone 701	/575-8520
	7. Transporter 2 Company Name	8. U	JS EPA ID Number	r	E. State Tra	nsporter's ID	- Hawaite
	Designated Facility Name and Site Address	s 10. U	JS EPA ID Number	<u> </u>		ter's Phone	water the state of
	WASTE RECOVERY SERVICES,					od appropriate (
	995 EAST HIGHWAY 10	1			H. Facility's	Phone :	(数2)主
	BELFIELD, ND 58622-0910			12. Conta	(701)	575-8520 3. 14.	
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	J. Additional Descriptions for Materials Listed	Above			K Handling (Codes for Waste	a Listed Above
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	15. Special Handling Instructions and Addition IN CASE OF AN EMERGENCY SPIN		REC AT 1-80	30-A2A-	9300		4
	JOB # 011670 (SECURITY SEALS	S: 1733-1735)					
	ALTERNATE PHONE : (605) 642						
	16. GENERATOR'S CERTIFICATION: I hereby declare proper shipping name and are classified, packed, m according to applicable international and national go	narked, and labeled, and are in all r				у	11 P
	If I am a large quantity generator, I certify that I economically practicable and that I have selecte	have a program in place to red	tuce the volume and	toxicity of w	aste generated	to the degree I ha	ive determined to be
	future threat to human health and the environme the best waste management method that is availab	int; OR, if I am a small quantity	generator, I have made	de a good f	aith effort to mil	nimize my waste g	peneration and select
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F	19. Discrepancy Indication Space						
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Ļ	20. Facility Owner or Operator: Certification of			nis manifes	t except as po	oted in Item 19.	
Ť	Printed Typed Name	Sig	anamie /	9%	Hets.	Ĺ	Month Day Year
<u></u>	tyle F15 Labelmaster, An American Labelmark Co., Chicago,	II 80848 (800) 621-5808	-	-	50.5		your editions are obsolete

Btyle F15 Labelmaster, An American Labelmark Co., Chicago, IL 80846 (800) 621-5808

EPA Form 8700-22 (Rev. 9-88) Previous editions a

Month Day Year

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

DESCRIPTION

17 6 AV

19. Discrepancy Indication Space

MANUFEST NOT

DUANTITY

Ple	ase	print or type. (Form designed for use on elite (1	2-pitch) typewriter.)				Form Approved. Of	MB No. 2	050-0030
1		UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA	Docu	ifest ument No.	2. Pa			the shaded areas by Federal law.
П	3.	Generator's Name and Mailing Address (RS	Alexandria Par	A. St	ate Manifest Do	cumen	t Number
П			1846 NORTH AVEN					10	
П			SPEARFISH, SD	57783-0277		B. St	ate Generator's	ID ·	
П	-	Generator's Phone (665) 642-7 Transporter 1 Company Name	6.	US EPA ID Numb	er	C. St	ate Transporter	s ID w	XI. (20)
П	1	WASTE RECOVERY SERVICES.		D.9.8.2.5.9.1					15 /5-852 @
П	7.	Transporter 2 Company Name	8.	US EPA ID Numb			ate Transporter		
	L					4	ansporter's Pho		
П	9.	Designated Facility Name and Site Addre		US EPA ID Numbe	er	G. St	ate Facility's ID		
П		WASTE RECOVERY SERVICES,	INC.				W-075		
П		995 EAST HIGHWAY 10 BELFIELD HD 58822-0916	la n	0982591	700		701) 575-	arrive	¥ ,.
Н	-				12. Conta		13.	14.	I.
G	11	. US DOT Description (Including Proper Sh	ipping Name, Hazard Cla	ass and ID Number)	No.	Туре	Total Quantity	Unit Wt/Vol	Waste No.
E	a.	WASTE PAINT RELATED MA							
E		Kulene, 3.0, MA1263, F	G 11, RQ, (DØØ	1, FØØ3,	13/2		2001-1	1	001,F003
A	-	X F0051. (127)			7.15	PA	20060	127	900
ORI	b.		RECEIVE	D					
	C.		AUG 14 20	00			···		
	d.	Des	T OF ENVIRONMENT RESOURCES - RO	& NATURAL CRO					
11	J.	Additional Descriptions for Materials Liste	d Above			K. Har	ndling Codes for	Waste	es Listed Above
Н	ai	RQ=1,000 POUNDS				21 8	508W30046		
Ш					3				
П									
П	15	Special Handling Instructions and Addition	onal Information						
П		B # 011355 (SECURITY SEAL							
П		NERATOR CONTACT: BRUCE DE					66		
Ш	-	ERGENCT PHONE : (890) 424					no hu		
Н	100	 GENERATOR'S CERTIFICATION: I hereby declar proper shipping name and are classified, packed, 	marked, and labeled, and are						
П		according to applicable international and national if I am a large quantity generator, I certify that		to reduce the volume and	d toxicity of v	vaste ge	nerated to the dec	ree I h	ave determined to be
Ш	1	economically practicable and that I have select future threat to human health and the environment	ted the practicable method of	of treatment, storage, or	disposal curre	ently ava	ailable to me which	h minim	izes the present and
П		the best waste management method that is available		d	ade a good		71 10 minutes my		90101
L	,	Printed/Typed Name	. 1.	Signature			12		Month Day Year
Y	1	Les Later	of the Control of the	1 3 m 11 . 3			· · · ·		
R	17	 Transporter 1 Acknowledgement of Rec Printed/Typed Name 	elpt of Materials	Signature			7 32		Month Day Year
RANSP	15	Janes T. Hellman		T	-5-/	11			lotatolzivik
	18	8. Transporter 2 Acknowledgement of Rec	eipt of Materials	1111		-	/		Landon I mail and a state
ORTER		Printed/Typed Name		Signature					Month Day Year
Γ	19	Discrepancy Indication Space							
F									
FACI					1				
L		. Facility Owner or Operator: Certification	of receipt of hazardous		this manife	st excé	pt as noted in It	em 19.	
Ý		Printed/Typed Name	Land 1	Signature	17/1/2	da			Month Day Year
L_			U 60646 (800) 621,580K	Jeller 1).	1600	F 1	8700 02 Way	0.00100	Late I I I I I



ase print o	or type. (Form designed for use on eli	z-pitch) typewriter.)				Form Ap	oproved ON	18 No 20	50-0039. Expires 9-30-
1	NIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EP	bbbbbbb	ument No	0		is no	require	n the shadec area ed by Federal law.
3. Gen	erator's Name and Mailing Address	1840 NORTH AVE	NUE				enerator		nt Number
4 Gen	erator's Phone (605) 642-	SPEARFISH, SD	57783-0277		0.0	itale G	onerator	SID	
	nsporter 1 Company Name	6.	US EPA ID Numb	er	C. S	tate Tr	ransporte	er's ID y	H-331
WAS	TE RECOVERY SERVICES.	INC. Wb	babbbbl	7 h 6	D. T	ranspo	orter's Ph	oneo	/575-8520
	sporter 2 Company Name	8.	US EPA ID Numb	er	E. S	tate Tr	ansporte	er's ID	
		31.34 TOTAL 51			-		rter's Ph		
9. Desi	ignated Facility Name and Site Addr	ess 10.	US EPA ID Numb	er	G. S	tate F	acility's I	D	
995	TTE RECOVERY SERVICES, EAST HIGHWAY 10	1.1		111	H. F	37 (0.00)	s Phone		
BEL	FIELD, MD 58622-0910	h b	bhabkah	12. Con		701	13.	-8520 14	·
11. US	DOT Description (Including Proper S	Shipping Name, Hazard C	Class and ID Number)	No.	Туре		Total uantity	Unit	Waste No
а.	WASTE PAINT RELATED M Kylene, 3.0, NA1265, F005), (127)			DI	1 4		200	P	001,F003
D.		RECEIVE	27	17.07	100				
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-		AUG 14 20	MA	-	+-			-	
2.		AUG 14 20	NO						
				111	11	11	111	1	
1.	0.	PT OF ENVIRONMENT	& NATURAL						
		RESOURCES - R	CHO					1	
	tional Descriptions for Materials List				Ш				es Listed Above
et RO	= 1,000 POUNDS				a) 6	5081	W00046	5-T50	
	ecial Handling Instructions and Addi								
	SE OF AN EMERGENCY SP				-9300	,			
	NSE # 127 (JOB # 0110 NATE PHONE : (605) 64				VEIFI	0			
16. GEN	ERATOR'S CERTIFICATION: I hereby deck	are that the contents of this co	ensignment are fully and acc	curately desc	cribod abo	ove by			
	er shipping name and are classified, packed ording to applicable international and national		re in all respects in proper c	ondition for t	Iransport	by high	way		
If I	am a large quantity generator, I certify the nomically practicable and that I have sele- re threat to human health and the environ- best waste management method that is ava-	at I have a program in place ected the practicable method iment; OR, if I am a small of	of treatment, storage, or quantity generator, I have n	disposal cu	rrently av	vailable	to me wh	ich minic	nizes the present and
-	nted/Typed Name		Signature	1			77.94		Month Day Yea
1	June Lehrer		Mari	1	1.	. 1	. 4		11141
17. Tra	insporter 1 Acknowledgement of Re								aterets about out at
Pri	nted/Typed Name		Signature		1	1			Month Day You
7	- Inthing		1		11.1	L.	Mr.		
	nsporter 2 Acknowledgement of Re	ceipt of Materials							
Pri	nted/Typed Name		Signature						Month Day Yea
19. Dis	crepancy Indication Space		-						
				/					
	cility Owner or Operator: Certification nted/Typed Name	n of receipt of hazardou		this manif	est exc	ep) as	notedin	Item 19	
Pri	KEVIN B. THE	HEERY	Signature	0.5	111	de	4		Month Day Yes

Style F15 REV-6 LARCEMASTER, Div. of AMERICAN LABELMARK CO., CHICAGO, IL 60646 (800) 621 5808

FPA Form 8700-22 (Rov. 5-88) Previous edisons are inhorist.



		UNIFORM HAZARDOUS WASTE MANIFEST	G D D D D D D	Docu	ument N	Ų.	Page 1	Inform is not	ation ir	n the shaded d by Feder	ed areas al law.
	3.		QUEEN CITY MOTO	IRS	41414		State Ma	nifest Do	cumer	nt Number	
$\ $			1840 NORTH AVEN			B. 8	State Ge	nerator's	ID	-	
$\ $	4.	Generator's Phone (605) 642-	SPEARFISH, SD 2766	3//83-02//						_	
II		Transporter 1 Company Name	6.	US EPA ID Numbe	er			ansporte		WH-331	
II	-	WASTE RECOVERY SERVICES,	INC. ND	D 9 8 2 5 9 1	179	4 D. 1	ranspoi	rter's Pho	one ₇₀	1/575-6	3520
II	ľ.	Transporter 2 Company Name	ı ° 1		er 			ter's Pho			
\parallel	9.	Designated Facility Name and Site Address	ss 10.	US EPA ID Numbe	er		THE PERSON NAMED IN COLUMN	clity's ID	-		12 30
\parallel		WASTE RECOVERY SERVICES,	INC.				HW-0		(A)	是在证明	· A
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G	11	·US DOT Description (Including Proper Sh ☐ HM☐			No.	Туре		otal antity	Unit Wt/Vol	Wast	e No.
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	15	Special Handling Instructions and Additi	onal Information	Line State of the			4-4-	90	Allaine Allaine		¥ &
II	II	N CASE OF AN EMERGENCY SPI	ILL, CONTACT CH			24-930	00				
II		ESPONSE # 26 (JOB # 010928 TERNATE PHONE : (605) 642				DELEH	UADE				
Ш		G. GENERATOR'S CERTIFICATION: I hereby declar									
Н	"	proper shipping name and are classified, packed, according to applicable international and national	marked, and labeled, and are					ay			
II		If I am a large quantity generator, I certify that	I have a program in place I	to reduce the volome and	toxicity	of waste g	enerated	to the de	gree h	ave determin	ned to be
Ш		economically practicable and that I have select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat to human health and the environment of the select future threat future thr	nent; OR if I am a small qua	antity generated I have be	ano a	ood laith e	fort to m	o me which inimize my	waste	generation a	nd select
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Ļ	20). Facility Owner or Operator: Certification	of receipt of hazardous	materials covered by	this may	nifest edo	entras n	oted in I	tem 19		
ţ	-	Printed/Typed Name	11-11	Signature	^	111		3.00 111		Month Da	y Year
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REPARTMENT AND AND DATE: 18 00 BPA 17-17-19-148 BOLLO City Motors ADDRESS:	MAME: Our City Motors ADDRESS:
SOLD BY: CASH C.O.D. CHARGE ON ACCT. MDSE RTD. PAID OUT	SOLD BY: CASH C.O.D. CHARGE ON ACCT. MOSE RTD. PAID OUT
QUANTITY DESCRIPTION PRICE AMOUNT. 9	QUANTITY DESCRIPTION PRICE AMOUNT
Repthis copy for your records **C.R. Company 1216 Columbus Rapid City, SD 57731 EPA #987670148	KEEP THIS COPY FOR YOUR RECORDS O1998 REDIFORM® 5L527
SOLD BY: CASH C.O.D. CHARCE ON ACCT. MDSERTD. PAID OUT	SOLD BY: CASH C.O.D. CHARGE ON ACCT. MDSERTD. PAID OUT
OUANTITY DESCRIPTION PRICE AMOUNT: 190 2 3 4 5 6 7 8 9	QUANTITY DESCRIPTION PRICE AMOUNT 170 2 3 4 5 6 7 8 9

(605) 642-7684 (Off) (605) 641-7684 (Cel) P.O. Box 431 Spearfish, SD 57783

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	Sub Total 4500
	Tax 4% 180C
	Tax 2%
Balances not paid within 30 days from invoke	ce date will accrue a service Total 47700



UPERIOR SANITATION

- 24 HOUR EMERGENCY SERVICE - (605) 642-7

P.O. Bo

(605) 642-7684 (Off) (605) 641-7684 (Cel) P.O. Box 431 Spearfish, SD 57783

NAME Duenc	CELVI	M+5			
ADDRESS 1890	W. Hu				
PHONE		DAT	<u>5-2</u>	4-20	200
Septic Tank	_2_	loads x\$		2000	0
Dumping Fees		loads x\$		a 75	00
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Drain Cleaning/	Backb E hrs x	\$ <u>25 @</u>	per hr.	11250	り
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Portable Restrooms:	M	lonthly \$			
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				Sub Total	38750
- '				Tax 4%	155C
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Balances not paid within 30 days for charge of 2% per month.	rom invoice date wi	Il accrue a servi	Ce	Total	410,75

End of Report